

**To:** Papler, Roger@Waterboards[Roger.Papler@waterboards.ca.gov]  
**From:** Stralka, Daniel  
**Sent:** Tue 5/20/2014 6:56:53 PM  
**Subject:** RE: T-S/MV - Spectraphysics: Comments - VI Evaluation Workplan & Addendum  
**MAIL\_RECEIVED:** Tue 5/20/2014 6:56:00 PM

Sorry I wasn't able to respond sooner. For this question, you are correct the short-term action levels are the acute values. I would reference ATSDR's Minimum Risk Levels (MRLs) <http://www.atsdr.cdc.gov/mrls/mrlolist.asp#30tag> which have acute values. For TCE specifically, their amendment reflecting the IRIS file, uses the short term value as protective of the acute exposure. So there now is no acute value. The original sort-term and acute values were the withdrawn ATSDR MRLs. EPA was also using those previously at MEW and other sites.

Per your phone call yesterday about rounding HI, there is no clear answer. In general we speak of the risks as order of magnitude estimates, therefore one or 2 significant digits. We do not round 0.8 up, so why would we round 1.4 down. However, it is a risk management call. For TCE the HI of 1 is the short-term action level based on fetal heart defects. Remember the HI is a ratio of the modeled exposure to the reference concentration, below this level we would not expect to see any hazardous effects. There is a safety factor of 10 but any exceedance of the HI increases the probability of seeing an effect. So managing the risk to below the HI of 1 is preferable but you will need to balance the exposure basis of that determination and the potential outcomes. Hope that helps.

You can call me if you want to discuss it more.

**From:** Papler, Roger@Waterboards [mailto:Roger.Papler@waterboards.ca.gov]  
**Sent:** Tuesday, May 20, 2014 11:31 AM  
**To:** edgard.bertaut@ATIMetals.com  
**Cc:** Bradshaw, Don; Kalve, Erica; MORASH, MELANIE; Stralka, Daniel  
**Subject:** T-S/MV - Spectraphysics: Comments - VI Evaluation Workplan & Addendum

Hello Edgard:

Thank you for submitting the 9May14 *Work Plan Addendum for Vapor Intrusion of 1245 Terra Bella Avenue* (Addendum).

Regional Water Board and USEPA staff reviewed the Addendum along with the approved 24Sept10 *Work Plan to Evaluate Potential Vapor Intrusion in the Off-Property Study Area and at 1250 West Middlefield Road* (Workplan). Table 1 of the Workplan indicates that the respective short-term and acute screening levels for trichloroethene (TCE) are 537 and 10,748 micrograms per cubic meter (ug/m3).

Since issuing the Workplan, USEPA finalized and uploaded their *TCE Risk Assessment* (TCE RA) to their IRIS data base. Based on the TCE RA, the short-term screening non-cancer screening levels for commercial/industrial land use have been significantly lowered to 9 or 7 ug/m3 for 8- or 10-hour days. Please check in with Region 9 USEPA regarding what they want to use for an acute screening level. Please revise Table 1 of the Workplan and attach the revised table to the Addendum.

Respectfully,

Roger W. Papler, P.G.

Engineering Geologist

San Francisco Bay Regional Water Quality Control Board

1515 Clay Street, Suite 1400

Oakland, CA 94612

**From:** Kalve, Erica [<mailto:Erica.Kalve@arcadis-us.com>]

**Sent:** Tuesday, May 20, 2014 10:09 AM

**To:** Papler, Roger@Waterboards

**Cc:** Bradshaw, Don

**Subject:** Regarding 1245 Terra Bella Avenue

Dear Roger,

I received your voice message this morning. To answer your question, to the best of my knowledge, the sampling that was conducted by IRIS Environmental in October 2013 was done as part of a due diligence investigation in consideration of a property transfer but no changes in ownership have occurred.

Please let me know if you need any additional information.

Best Regards,

Erica

Please note my new contact information is provided below.

**Erica Kalve, PG** | Senior Geologist | [erica.kalve@arcadis-us.com](mailto:erica.kalve@arcadis-us.com)

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